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THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

Matthew C Charles  
925 Columbus St Wilmette  
IL 60091

Plaintiff(s),

vs.

Ron & Mary Charles  
925 Columbus St Wilmette  
IL 60091

Defendant(s).

16cv9237  
JUDGE LEINENWEBER  
MAG. JUDGE FINNEGAN

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Matthew C Charles.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, \_\_\_\_\_, is  
(name, badge number if known)

☐ an officer or official employed by \_\_\_\_\_;  
(department or agency of government)  
\_\_\_\_\_ or

☐ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is \_\_\_\_\_. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about \_\_\_\_\_, at approximately \_\_\_\_\_ ☐ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of \_\_\_\_\_  
\_\_\_\_\_, in the County of \_\_\_\_\_,  
State of Illinois, at \_\_\_\_\_,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

\_\_\_\_\_  
\_\_\_\_\_

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

- \_\_\_\_\_.
7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: ***(Leave blank if no custom or policy is alleged):*** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

8. Plaintiff was charged with one or more crimes, specifically:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

9. ***(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")*** The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows \_\_\_\_\_
- \_\_\_\_\_.
- ☐ Other: \_\_\_\_\_.

\_\_\_\_\_  
<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

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10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

My Parents Bully me around. I'm 40 years  
 young but I'm Disabled with 6 different Disabilities  
 and I'm a Cancer Survivor. They knew if they  
 change the conversation into there favor  
 it's 2 against 1. My Dad Also Bulled me into not  
 Pressing Charges against him on July 25, 2016  
 when he assaulted me with the Door going into  
 my room. My Parents are also Coniving, manipulative,  
 My Parents are sometimes very verbally Abusive. Not  
 of yelling at me for no reason and FBombs. I have  
 them on Husing Violations. I pay Room & Board and  
 they have locked me out several times for no reason.  
 See att achment.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

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13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No Doesnt matter



They threaten to take my privacy away. I pay room and Board here. They don't think I have renters rights. I told my mom that I didn't want to pay my Room & Board And move and she said and I quote "I don't care I'll just take it out of your account, I'm your payee". To me that's Strong Armed Robbery.

My Payee (my mom) makes sure she gets paid first and what I want a distant second. My Payee (mom) writes checks out of my account for 1800.00 dollars to my dad when my check is for 1003.00. Grand Theft - Donating 8000.00 Dollars worth of Journals without my permission to charity. Emotional Distress - Restricting the internet and sometimes the TV. I only have hrs 1 in the morning and same in the afternoon.



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14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ (*Place X in box if you are seeking punitive damages.*) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Matthew C Charles

Plaintiff's name (*print clearly or type*): Matthew C Charles

Plaintiff's mailing address: 925 Columbus St

City Wilmette State IL ZIP 60091

Plaintiff's telephone number: (978) 809-7136.

Plaintiff's email address (*if you prefer to be contacted by email*): \_\_\_\_\_

matthew.charles.730@yahoo.com

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

*If yes, please list the cases below.*

Rush North Shore Medical Center

***Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.***